

**Exhibit 2**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

Angela Steinhardt,

*Plaintiff,*

v.

albertAI.click, Lena Doe, and John  
Does 1 – 20,

*Defendants.*

Case No. 1:25-cv-00303-MJT

**Declaration of Marshal Hoda**

I, Marshal Hoda, state and swear as follows.

**I. Introduction**

1. My name is Marshal Hoda. I am of sound mind and capable of making this Declaration. I have personal knowledge of the facts stated herein.

2. I represent Angela Steinhardt, the Plaintiff in this matter.

**II. Notice to Defendants**


3. I notified the Defendants of the upcoming preliminary-injunction hearing via four distinct channels. I have attached true and correct documentation of the notice to this Declaration, as indicated below.

- Email to domdom007haha@gmail.com (Attachment A);
- WhatsApp message to Lena Doe at 254-214-1269 (Attachment B);

- WhatsApp message to “Ashley” from AlbertAI Finance Department at 832-531-3080 (Attachment C).
- WhatsApp message to Albert AI Finance Department at 513-238-1733 (Attachment D).

### VERIFICATION

I, Marshal Hoda, hereby verify and declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "M Hoda", enclosed within a large, loopy circular flourish.

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Marshal Hoda

Dated: July 3, 2024

**Ex. 2-A**

**Monday, July 7, 2025 at 11:50:04 AM Central Daylight Time**

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**Subject:** Re: Inquiry Regarding Frozen Binance Account - Binance Case ID #144025734  
**Date:** Thursday, July 3, 2025 at 1:48:45 PM Central Daylight Time  
**From:** Marshal Hoda <marshal@thehodalawfirm.com>  
**To:** ศุภกร แซ่ฉั่ว <domdom007haha@gmail.com>, Evan Cole <evan@thehodalawfirm.com>

Greetings,

We believe you may be referring to a Binance account freeze implemented in one of our recent cases. The case is: *Steinhardt v. AlbertAI, et al.*, Case No. 1:25-cv-00303-MJT.

The plaintiff has requested a preliminary injunction freezing certain accounts that she alleges received assets that were stolen from her. A hearing on this motion will take place on July 9, 2025, at 9:00am, at the Jack Brooks Federal Courthouse, 300 Willow Street, Beaumont, Texas.

You can view the public docket, including Plaintiff's Motion for Preliminary Injunction, at the following link: <https://www.courtlistener.com/docket/70500080/steinhardt-v-albertaiclick>.

Best,  
Marshal Hoda  
Attorney & Founder  
The Hoda Law Firm, PLLC

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**From:** ศุภกร แซ่ฉั่ว <[domdom007haha@gmail.com](mailto:domdom007haha@gmail.com)>  
**Date:** Thursday, July 3, 2025 at 4:51 AM  
**To:** Evan Cole <[evan@thehodalawfirm.com](mailto:evan@thehodalawfirm.com)>, Marshal Hoda <[marshal@thehodalawfirm.com](mailto:marshal@thehodalawfirm.com)>  
**Subject:** Inquiry Regarding Frozen Binance Account - Binance Case ID #144025734

**Dear Mr. Cole and Mr. Hoda,**

I am writing to you following the instruction I received from Binance Customer Support on their official chat platform. My case ID is #144025734.

I was informed that my Binance account has been frozen as it is under investigation by law enforcement. To the best of my knowledge, I have not been involved in any wrongful activities.

Could you please provide me with more details regarding this case and inform me of the necessary steps required from my side to cooperate with the investigation and work towards resolving this matter?

For your reference, my Binance Case ID is #144025734. Please let me know if you require further information from me.

Thank you for your attention to this matter.



Lena Doe



Ex. 2-B

Thursday

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**COURT LISTENER**  
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**Steinhardt v. albertAI.click, 1:25-cv-00303 - CourtListener.com**

Docket for Steinhardt v. albertAI.click, 1:25-cv-00303 — Brought to you by Free Law Project, a non-profit dedicated to creating high quality open legal information.

courtlistener.com



You have been sued in the United States District Court for the Eastern District of Texas. The case is: Steinhardt v. AlbertAI, et al., Case No. 1:25-cv-00303-MJT.

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1:45 PM ✓



Ashley Doe



Ex. 2-C

Thursday

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1:46 PM ✓✓



Albert Finance

**Ex. 2-D**

Thursday

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1:46 PM ✓✓